

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
DAYTON DIVISION**

In Re:

Case No. 14-32453

Andrew M. Browne

aka Andrew Browne

aka Andrew Martin Browne

aka Drew Browne

aka Drew M. Browne

Chapter 13

Debtor(s).

Judge Guy R. Humphrey

**RESPONSE TO CHAPTER 13 TRUSTEE'S OBJECTION TO NOTICE OF
MORTGAGE PAYMENT CHANGE FILED BY CREDITOR U.S. BANK TRUST,
NATIONAL ASSOCIATION and REQUEST FOR ORDER REQUIRING CREDITOR
TO PROVIDE AN ESCROW ANALYSIS PURSUANT TO WAIVER OF UNNOTICED
ESCROW SHORTAGE or REFUND OF ESCROW SURPLUS (DOC. 57)**

U.S. Bank Trust National Association, as Trustee of the IGSC Series II Trust (“Creditor”), by and through their undersigned counsel, hereby files this Response to the Chapter 13 Trustee’s Objection to Notice of Mortgage Payment Change filed by Creditor U.S. Bank Trust National Association and Request for Order Requiring Creditor to Provide an Escrow Analysis Pursuant to Waiver of Unnoticed Escrow Shortage or Refund of Escrow Surplus, doc. 57. Creditor states as follows:

1. Creditor is currently investigating the allegations of the Trustee, and Counsel for Creditor shall reach out to the Chapter 13 Trustee’s Office to amicably resolve the matter. It is Counsel for Creditor’s understanding that the Chapter 13 Trustee’s Office has no objection to the filing of this Response. Therefore, Creditor has not filed a Motion for Leave to Respond Out of Time.

WHEREFORE, Creditor requests that Trustee's Objection be overruled.

Respectfully Submitted,

/s/ Jon J. Lieberman

Jon J. Lieberman (0058394)
Sottile & Barile, Attorneys at Law
394 Wards Corner Road, Suite 180
Loveland, OH 45140
Phone: 513.444.4100
Email: bankruptcy@sottileandbarile.com
Attorney for Creditor

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response was served **electronically** on September 10, 2019 through the Court's ECF System on all ECF participants registered in this case at the e-mail address registered with the Court

And by **ordinary U.S. Mail** on September 10, 2019 addressed to:

Andrew M. Browne, Debtor
357 Vindale Dr.
Beavercreek, OH 45440

/s/ Jon J. Lieberman

Jon J. Lieberman (0058394)
Attorney for Creditor